



R.C. HUPP LAW PLLC

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Regional Freedom of Information Act Officer
Region V
Environmental Protection Agency
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590

December 6, 2017

Re: Freedom of Information Act Request
Verona Well Field Superfund Site, Battle Creek, MI
EPA Region V, Site/Spill ID #05-51
DOJ Case #90-11-2-739

Dear FOIA Officer:

I request copies of documents¹ related to the following subject matter be provided to the me. I will be responsible for all costs permitted by law incurred in complying with this request. Please provide me with an estimate of the cost of complying with this request.

I request all documents pertaining to the Verona Well Field Superfund site ("Site") (see Re: line above), relating to work performed by S.S. Papadopoulos & Associates, Inc. ("SSPA"), a USEPA Superfund contractor, related to the following topics:

- The request of the Verona Well Field Group to shutdown GMBW-3 & -4,
- Performance of the existing groundwater remedies at the Site,
- Exceedances at the northern line of blocking wells at the Site,
- Substitution of the southern blocking wells for the current air sparging groundwater remedy at the Annex,
- Possible recontamination of the neighborhood northwest of the Annex and/or loss of hydraulic control of groundwater contamination by the groundwater remedy in that or another area,
- The need for, placement and construction of new groundwater monitoring wells,
- Analyses of Site soils, groundwater, geology and contamination,
- All soil, groundwater and contaminant plume modeling and model results,

¹ "Documents" includes any record or form of communication retained in a permanent form (e.g., paper copy, email, archived electronic file). The Group does not intend to include in that definition documents of a trivial or nonsubstantive nature (e.g., communications acknowledging receipt of correspondence, requests for meeting, acceptance of meetings).



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- Any other subject related to the Verona Well Field site that SSPA was asked to address or did address,
- and falling within the following categories:
1. SSPA's contract, scope of work and budget, as initially approved and as thereafter amended,
 2. SSPA invoices and all supporting materials submitted to USEPA,
 3. SSPA progress reports,
 4. All draft and final work product submitted by SSPA to USEPA,
 5. Data analyses and models and modeling results provided to USEPA,
 6. Documents between SSPA and USEPA with regard to the scope of work to be performed by SSPA, the progress on and manner of performance of that work, draft and final work product, and USEPA's evaluation of SSPA's work product,
 7. Documents between USEPA and MDEQ and Battle Creek with regard to the scope of work to be performed by SSPA, the progress on and manner of performance of that work and their (MDEQ and Battle Creek) comments on SSPA's work product,
 8. Internal USEPA documents with regard to budget and the scope of work to be performed by SSPA, SSPA's invoices and the amount being charged by SSPA, the progress on and manner of performance of SSPA's work, and USEPA's review or evaluation of SSPA's work product, and
 9. Internal USEPA documents related to the Group's 2016 Notice of Dispute.

Staff at EPA Region 5 knowledgeable about the documents requested include Assistant Regional Counsel Peter Felitti and Superfund RPM Michelle Heger

Sincerely,

R. Craig Hupp

cc (via email): Peter Felitti
Michelle Heger
VWF Executive Committee
Bridget Morello